

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

IN RE:

CASE NO.: 19-31575-hcm  
CHAPTER 13

William M. Byers,  
aka Bill Byers,  
aka William M. Byers, Jr,  
Debtor,  
Christina O. Byers,  
Joint Debtor.

JUDGE H. Christopher Mott

\_\_\_\_\_ /

AFFIDAVIT

STATE OF TEXAS )  
 )  
COUNTY OF HARRIS )

I, Nikole Byers, a Specialist for Reverse Mortgage Solutions, Inc. ("Secured Creditor"), declare under penalty of perjury that I have personal knowledge of the information set forth below, which is true and correct to the best of my knowledge, information and belief.

1. I am of sound mind, capable of making this affidavit, and am personally acquainted with the facts stated here.

2. I am a foreclosure specialist of Secured Creditor, and I have knowledge, care, custody, and control of all records concerning the account of William M. Byers and Christina O. Byers.

3. This affidavit is based on the loan payment records of Secured Creditor. These records are regularly maintained in the course of business and it is a standard business practice to make and maintain these records. Said records reflect the loan payments that are noted in the records at the time of receipt by persons whose regular duties include recording this information. I maintain these records and regularly use and rely upon them in the performance of my duties.

4. Secured Creditor has a perfected security interest in the real property located at 6624 Mariposa Drive, El Paso, Texas 79912, which is legally described as follows:

**Lot 9, Block 12B, CHAPARREL PARK UNIT "2", an addition to the City of El Paso, El Paso County, Texas, according to the Plat thereof recorded in Volume 27, Page 9, Plat Records of El Paso County, Texas.**

5. The above information is referenced and shows in the records attached hereto as "Composite Exhibit A," which consists of nineteen (19) pages and includes true and correct copies of the Promissory Note executed by William M. Byers and Christina O. Byers, on October 16, 2013 ("Note"), any required endorsements, the Recorded Deed of Trust securing payment on the Note ("Mortgage"), Assignment(s) of Mortgage, and other applicable documentation supporting Secured Creditor's right to seek relief from the automatic stay and to foreclose if necessary. The documents attached as "Composite Exhibit A" are created, maintained, and incorporated by Secured Creditor in the regular course of its business, and it was in the regular course of Secured Creditor's business for an authorized representative of said business, to rely upon the accuracy of the contents of these records. The records of the acts, conditions, or opinions were made at or near the time, or from information transmitted by an individual with knowledge of the acts, conditions, or opinions contained in such records. Moreover, the documentation and transfer of the record to Secured Creditor was performed in accordance with normal industry practices and in compliance with industry standards and is reliable and trustworthy information. It was the regular course of Secured Creditor's business for an employee or representative of its business with knowledge of acts, conditions, or opinions, to make those records or to transmit the included information.
6. As of December 8, 2020, the total payoff amount is \$164,930.98, which includes the Debtor's post-petition delinquency in the amount of \$1,823.00. A true and correct copy of Debtor's payment history is attached hereto as "Exhibit B."
7. Based upon the El Paso Central Appraisal District's valuation attached hereto as "Exhibit C," the value of the property is \$175,741.00.

Further, Affiant sayeth not.

Date: Jan 20, 2021

SWORN TO and SUBSCRIBED before me this  
20 day of Jan, 2021.

Comalitha Lacy  
Notary Public

Nikole Byars  
Nikole Byars  
Specialist  
Reverse Mortgage Solutions, Inc.

